



John P. Zager  
General Manager

Union Oil Company of California  
3800 Centerpoint Drive  
Suite 100  
Anchorage, AK 99503  
Tel 907 263 7815  
Fax 907 263 7897  
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March 2, 2012

**SCANNED**

**RECEIVED**

48 3/9/12 ANU MAR 06 2012  
2339.48.002 DEC  
Division of Quality  
Wastewater Discharge Program

Director, Office of Compliance and Enforcement  
Attention: Data Entry Staff  
United States Environmental Protection Agency, Region 10  
1200 Sixth Avenue, OCE-133  
Seattle, WA 98101

RETURN RECEIPT REQUESTED  
CERTIFIED MAIL: 91 7011 2970 0001 9243 7751

Re: REVISED Discharge Monitoring Reports  
NPDES Permit No. AKG-31-5000

To whom it may concern:

Union Oil Company of California (UOCC) operates the Dolly Varden Platform (AKG-31-5009), Grayling Platform (AKG-31-5018), King Salmon Platform (AKG-31-5008), Steelhead Platform (AKG-31-5019), and Trading Bay Production Facility (AKG-31-5002) in Cook Inlet, Alaska. In our efforts to assure compliance with the Cook Inlet NPDES General Permit AKG-31-5000 and applicable laws and regulations, UOCC identified Discharge Monitoring Reports (DMRs) that require revision. None of the changes result in any violations of permit conditions.

A list of revised DMRs is presented below in Table 1. Both the revised DMR and photocopies of the original DMR pages have been included. Consistent with the authorization in your e-mail from September 16, 2010, this letter certifies all of the 26 pages of DMRs attached to this letter.

If you have any questions, please direct them to Mr. Rodney Bailey at (432) 687-7123 or via e-mail at [bailerq@chevron.com](mailto:bailerq@chevron.com).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Director, Office of Compliance and Enforcement  
US Environmental Protection Agency  
March 2, 2012  
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Sincerely,

A handwritten signature in black ink, appearing to read 'John P. Zager', with a long horizontal flourish extending to the right.

John P. Zager

cc: ADEC / Certified Mail 91 7011 2970 0001 9243 7768

**Table 1. DMR Revisions**

**February 2011**

<b>Facility</b>	<b>Parameter</b>	<b>Reason for Revision</b>
Grayling Platform (AKG-31-5016)	Workover Fluids (017)	Estimated amount of workover fluids sent to Trading Bay Production Facility were not reported.
Trading Bay Production Facility (AKG-31-5002)	Produced Water and Sand (015)	Estimated workover fluid flow rate was not reported.

**April 2011**

<b>Facility</b>	<b>Parameter</b>	<b>Reason for Revision</b>
Grayling Platform (AKG-31-5016)	Workover Fluids (017)	Estimated amount of workover fluids sent to Trading Bay Production Facility was misreported.
Trading Bay Production Facility (AKG-31-5002)	Produced Water and Sand (015)	Estimated well treatment/workover fluid flow rate was misreported.

**May 2011**

<b>Facility</b>	<b>Parameter</b>	<b>Reason for Revision</b>
King Salmon Platform (AKG-31-5008)	Workover Fluids (017)	Estimated amount of workover fluids sent to Trading Bay Production Facility was misreported.
Trading Bay Production Facility (AKG-31-5002)	Produced Water and Sand (015)	Estimated workover fluid flow rate was misreported.

**June 2011**

<b>Facility</b>	<b>Parameter</b>	<b>Reason for Revision</b>
King Salmon Platform (AKG-31-5008)	Workover Fluids (017)	Estimated amount of workover fluids sent to Trading Bay Production Facility was misreported.
Steelhead Platform (AKG-31-5019)	Workover Fluids (017)	Estimated amount of workover fluids sent to Trading Bay Production Facility was misreported.
Trading Bay Production Facility (AKG-31-5002)	Produced Water and Sand (015)	Estimated workover fluid flow rate was misreported.

**December 2011**

<b>Facility</b>	<b>Parameter</b>	<b>Reason for Revision</b>
Dolly Varden Platform (AKG-31-5009)	Non-Contact Cooling Water (009)	Waterflooding discharges for December 2011 should have been considered Non-Contact Cooling Water since the waterflood portion of the commingled waste stream was shut-in and there were no chemical additives. Volumes were corrected after original December 2011 DMR submittal.
Dolly Varden Platform (AKG-31-5009)	Waterflood (014)	Waterflooding discharges for December 2011 should have been considered Non-Contact Cooling Water since the waterflood portion of the commingled waste stream was shut-in and there were no chemical additives. Therefore there were no waterflood discharges in December 2011.

Director, Office of Compliance and Enforcement  
US Environmental Protection Agency  
March 2, 2012  
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bcc: Susan Saupe, CIRCAC  
Dolly Varden Lead Operators  
Grayling Lead Operators  
King Salmon Lead Operators  
Steelhead Lead Operators  
Trading Bay Production Facility Lead Operators  
HES 2011 NPDES DMR Facility Files  
HES 2011 NPDES DMR REGIONAL File

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)  
DISCHARGE MONITORING REPORT (DMR)**

**COPY**  
Form Approved  
OMB No. 2040-0004  
**REVISION**  
**12/28/2011**

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

**NAME:** UNION OIL COMPANY OF CALIFORNIA (UNOCAL)  
**ADDRESS:** P.O. BOX 196247  
ANCHORAGE, AK 99519-6247  
**FACILITY:** TRADING BAY TREATMENT FACILITY  
**LOCATION:** COOK INLET, Alaska  
**ATTN:** JOHN ZAGER, GENERAL MANAGER

**AKG315002**  
**PERMIT NUMBER**

**015-A**  
**DISCHARGE NUMBER**

MONITORING PERIOD			
MM/DD/YYYY			MM/DD/YYYY
FROM 06/01/2011		TO	06/30/2011

**DMR Mailing ZIP CODE:** 99519  
**MINOR**  
(SUBR 02)  
**PRODUCED WATER AND SAND**  
External Outfall

**No Discharge** ☐

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
pH	SAMPLE MEASUREMENT	*****	*****	*****	NA	*****	NA	NA	NA	NA	NA
00400 V 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	6 MINIMUM	*****	9 MAXIMUM	SU		Monthly	GRAB
pH	SAMPLE MEASUREMENT	*****	*****	*****	6.9	*****	7.3	SU	0	Weekly	GRAB
00400 W 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	6 MINIMUM	*****	9 MAXIMUM	SU		Weekly	GRAB
Oil and grease	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
03582 T 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	*****	29 MO AVG	42 DAILY MX	mg/L		Weekly	GRAB
Oil and grease	SAMPLE MEASUREMENT	*****	*****	*****	*****	24	30	mg/L	0	Weekly	COMP24
03582 U 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	*****	29 MO AVG	42 DAILY MX	mg/L		Weekly	COMP24
Flow, in conduit or thru treatment plant*	SAMPLE MEASUREMENT	3.595192	3.773994	Mgal/d	*****	*****	*****	*****	NA	Monthly	ESTIMA
50050 1 0 Effluent Gross	PERMIT REQUIREMENT	Req. Mon. MO AVG	Req. Mon. DAILY MX	Mgal/d	*****	*****	*****	*****		Monthly	ESTIMA
Produced water, free oil	SAMPLE MEASUREMENT	*****	NA	NA	*****	*****	*****	*****	NA	NA	NA
79834 1 0 Effluent Gross	PERMIT REQUIREMENT	*****	Req. Mon. MO TOTAL	occur/mo	*****	*****	*****	*****		Daily	VISUAL

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	TELEPHONE	DATE
John Zager, General Manager Mid Continent/Alaska Business Unit TYPED OR PRINTED	(907) 276-7600	07/13/2011
	AREA Code NUMBER	MM/DD/YYYY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS(Reference all attachments here)

NO DISCHARGE OF PRODUCED SAND IS ALLOWED

T = GRAB SAMPLE

U = COMPOSIT SAMPLE

V = DISCHARGE < 1 MGD (PREVIOUS MONTHS AVG RATE)

W = DISCHARGE > 1 MGD (PREVIOUS MONTHS AVG RATE)

EPA Form 3320-1 (Rev.01/06) Previous editions may be used

\* Flow rates include deck drainage from Dolly Varden, Grayling, King Salmon, Monopod, and Steelhead Platforms.

Estimated Workover Fluid Flow Rate: 0.040089 mgd

12/28/2011 Revision: Estimated completion fluid flow rate was misreported

## NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

## DISCHARGE MONITORING REPORT (DMR)

Form Approved  
OMB No. 2040-0004REVISED  
3/2/2012

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: UNION OIL COMPANY OF CALIFORNIA (UNOCAL)  
 ADDRESS: P.O. BOX 196247  
 ANCHORAGE, AK 99519-6247  
 FACILITY: TRADING BAY TREATMENT FACILITY  
 LOCATION: COOK INLET, Alaska  
 ATTN: JOHN ZAGER, GENERAL MANAGER

AKG315002	015-A
PERMIT NUMBER	DISCHARGE NUMBER

MONITORING PERIOD			
MM/DD/YYYY		MM/DD/YYYY	
FROM	06/01/2011	TO	06/30/2011

DMR Mailing ZIP CODE: 99519  
 MINOR  
 (SUBR 02)  
 PRODUCED WATER AND SAND  
 External Outfall

No Discharge ☐

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
pH	SAMPLE MEASUREMENT	*****	*****	*****	NA	*****	NA	NA	NA	NA	NA
00400 V 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	6 MINIMUM	*****	9 MAXIMUM	SU		Monthly	GRAB
pH	SAMPLE MEASUREMENT	*****	*****	*****	6.9	*****	7.3	SU	0	Weekly	GRAB
00400 W 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	6 MINIMUM	*****	9 MAXIMUM	SU		Weekly	GRAB
Oil and grease	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
03582 T 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	*****	29 MO AVG	42 DAILY MX	mg/L		Weekly	GRAB
Oil and grease	SAMPLE MEASUREMENT	*****	*****	*****	*****	24	30	mg/L	0	Weekly	COMP24
03582 U 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	*****	29 MO AVG	42 DAILY MX	mg/L		Weekly	COMP24
Flow, in conduit or thru treatment plant*	SAMPLE MEASUREMENT	3.595192	3.773994	Mgal/d	*****	*****	*****	*****	NA	Monthly	ESTIMA
50050 1 0 Effluent Gross	PERMIT REQUIREMENT	Req. Mon. MO AVG	Req. Mon. DAILY MX	Mgal/d	*****	*****	*****	*****		Monthly	ESTIMA
Produced water, free oil	SAMPLE MEASUREMENT	*****	NA	NA	*****	*****	*****	*****	NA	NA	NA
79834 1 0 Effluent Gross	PERMIT REQUIREMENT	*****	Req. Mon. MO TOTAL	occur/mo	*****	*****	*****	*****		Daily	VISUAL

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER  John Zager, General Manager Mid Continent/Alaska Business Unit TYPED OR PRINTED	I certify under penalty of law that this document and its attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	TELEPHONE		DATE
		(907) 276-7600		07/13/2011
		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT		MM/DD/YYYY
AREA Code		NUMBER		

COMMENTS AND EXPLANATION OF ANY VIOLATIONS(Reference all attachments here)

NO DISCHARGE OF PRODUCED SAND IS ALLOWED

T = GRAB SAMPLE

U = COMPOSIT SAMPLE

V = DISCHARGE &lt; 1 MGD (PREVIOUS MONTHS AVG RATE)

W = DISCHARGE &gt; 1 MGD (PREVIOUS MONTHS AVG RATE)

\* Flow rates include deck drainage from Dolly Varden, Grayling, King Salmon, Monopod, and Steelhead Platforms.

Estimated Workover Fluid Flow Rate: 0.032709 mgd

3/2/2012 Revision: Estimated workover fluid flow rate was misreported